

*Via Electronic Filing*

November 20, 2019

Marlene H. Dortch, Esq.  
Secretary  
Federal Communications Commission  
445 Twelfth St., SW  
Washington, DC 20554

**Re:   *Application of Kuiper Systems LLC for Authority to Launch and Operate a Non-Geostationary Satellite Orbit System in Ka-band Frequencies***  
**File No. SAT-LOA-20190704-00057; Call Sign S3051**

Consumer Technology Association® (“CTA”)®<sup>1</sup> supports the above-captioned application by Kuiper Systems LLC (“Kuiper”), a wholly-owned subsidiary of Amazon.com Services, Inc., to “launch and operate a Ka-band non-geostationary satellite orbit (“NGSO”) fixed-satellite service (“FSS”) system to provide high-speed, low-latency broadband services to consumers, businesses, and other customers worldwide.”<sup>2</sup>

The consumer technology industry is rapidly introducing and improving technologies to enhance users’ experiences and improve their daily lives; more and more, these devices require robust connections to networks to provide maximum benefits to consumers. CTA supports the continued efforts of the Federal Communications Commission (“Commission”) to facilitate the availability and deployment of wireless communications services—including satellite broadband services—a priority recognized by both Congress and the Commission. As CTA has emphasized,

---

<sup>1</sup> As North America’s largest technology trade association, CTA® is the tech sector. Our members are the world’s leading innovators—from startups to global brands—helping support more than 18 million American jobs. CTA owns and produces CES®—the largest, most influential tech event on the planet.

<sup>2</sup> Application of Kuiper Systems LLC for Authority to Launch and Operate a Non-Geostationary Satellite Orbit System in Ka-band Frequencies, IBFS File No. SAT-LOA-20190704-00057, at i (July 4, 2019) (“Kuiper Application” or “Application”); *see also* Satellite Policy Branch Information: Space Station Applications Accepted for Filing, Public Notice, Report No. SAT-01416 (Sept. 27, 2019).

“[j]ust as the future internet will depend on a mixture of unlicensed and licensed spectrum across multiple bands, so too will it depend on the availability of rich and diverse infrastructure.”<sup>3</sup> The Kuiper Application represents another method of delivering broadband to consumers and innovators across the U.S.—including “to rural and hard-to-reach areas”<sup>4</sup> where the “unavailability of fixed broadband is particularly stark.”<sup>5</sup>

Competition breeds innovation and allowing another competitor into the broadband delivery market can speed further innovation and reduce consumer costs.<sup>6</sup> Consumer demand for connected devices, higher-speed applications, and more data-intensive services will only continue increase.<sup>7</sup> The U.S. is on the path to 5G wireless services that will offer consumers speeds 100 times faster and be five times more responsive than today’s networks.<sup>8</sup> The Kuiper Application can be a step on that path.<sup>9</sup>

---

<sup>3</sup> Comments of Consumer Technology Association, WT Docket No. 17-79, at 2 (June 15, 2017).

<sup>4</sup> Kuiper Application at ii.

<sup>5</sup> *Id.* at 7.

<sup>6</sup> See, e.g., Comments of the Interactive Entertainment Trade Organizations, IBFS File No. SAT-LOA-20190704-00057, Call Sign S3051, at 2-3 (filed Oct. 28, 2019) (noting that “a competitive marketplace of NGSO systems will likely result in a reduction of price for low latency Internet”).

<sup>7</sup> GSMA, *The 5G Era in the US*, at 30 (2018) <https://www.gsmaintelligence.com/research/?file=4cbbdb475f24b3c5f5a93a2796a4aa28-&download> (forecasting “5G adoption in the US to grow as fast as 4G adoption did.... By 2025, 5G will become the lead mobile network technology in the US....”); Cisco, *Visual Networking Index: Forecast and Trends, 2017-2022*, at 2 (Feb. 2019), <https://www.cisco.com/c/en/us/-solutions/collateral/service-provider/visual-networking-index-vni/white-paper-c11-741490.pdf> (predicting that mobile IP traffic will grow at a Compound Annual Growth Rate of 46 percent between 2017 and 2022, with wireless and mobile devices accounting for 71 percent of total IP traffic by 2022).

<sup>8</sup> Gary Shapiro, *What 5G can do for DC*, Washington Examiner (Mar. 4, 2019), <https://www.washingtonexaminer.com/opinion/op-eds/what-5g-can-do-for-dc>; see also Ajit Pai, Chairman, Federal Communications Commission, Remarks at the National Spectrum Consortium 5G Collaboration Event, Arlington, VA, at 1 (Apr. 30, 2019) (“5G will be even more transformative than 4G. Networks will be 100 times faster.”).

<sup>9</sup> CTA does not opine herein on the specific operating parameters proposed in the Application or any specific conditions proposed in comments or petitions, but urges the Commission to approve the Application quickly to advance 5G and other advanced broadband services.

In sum, CTA believes the Kuiper Application serves the public interest and supports expeditious grant of the application consistent with the Commission's spectrum sharing rules for NGSO FSS systems.

Sincerely,

/s/ Michael Petricone

Michael Petricone

Sr. VP, Government and Regulatory Affairs

/s/ Jamie Susskind

Jamie Susskind

Vice President, Policy and Regulatory Affairs